

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

IN RE:

IN PROCEEDINGS FOR A PLAN
UNDER CHAPTER 13

MARY MARGARET CROOKS

CASE NO.: 05-71032-3-13

MOTION TO DENY CONFIRMATION

Comes now Richard V. Fink, Trustee, and requests the Court deny confirmation of the debtor's proposed plan, filed about Oct 15, 2005, and in support thereof states that issues related to the proposed plan include:

1325(A)(6); THE DEBTOR HAS NOT COMMENCED WITH MAKING
PLAN PAYMENTS. THE TRUSTEE HAS FILED A MOTION TO DISMISS
FOR FAILURE TO COMMENCE.

Respectfully submitted,

/s/ Richard V. Fink, Trustee

Dated: December 14, 2005

Richard V. Fink, Trustee
818 Grand Blvd., Ste. 800
Kansas City, MO 64106-1901

NOTICE OF MOTION

Any response to the motion must be filed within twenty (20) days of the date

of this notice, pursuant to Local Rule 9013-1D, with the Clerk of the United States Bankruptcy Court. Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>. A copy of such response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. If debtor's counsel is not registered for electronic filing, you must serve the response by mail. If a response is timely filed, the Court will either rule the matter based on the pleadings, or set the matter for a hearing. If a hearing is to be held, notice of such hearing will be sent to all parties in interest. **If no response is filed within twenty (20) days, the Court MAY enter an Order Dismissing the case.** If an amended plan is filed, the motion to deny confirmation will be denied as moot without further notice. For information about electronic filing go to www.mow.uscourts.gov. If you have any questions about this document, contact your attorney.

NOTICE OF SERVICE

Appropriate parties will be served by the Chapter 13 Trustee's office either electronically or by mail.

CASTLE LAW OFFICE OF KC PC (#006000)